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Attorneys for Trustee,
JANINA M. ELDER

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

In re:

JACQUELINE ANNE WARNER
SSN xxx xx 6562

Debtor

JANINA M. ELDER, TRUSTEE,

Plaintiff

v.

CITIBANK, N.A.,

Defendant.

Case No. 09-33436 DMJE

Chapter 7

**COMPLAINT FOR ACCOUNTING AND TURNOVER,
AND FOR ATTORNEY'S FEES**

COMES NOW, Plaintiff JANINA M. ELDER trustee ("Plaintiff" or "Trustee") of
the above referenced bankruptcy estate, and represents as follows:

JURISDICTION

1. Jurisdiction over this action exists pursuant to 28 U.S.C. § 157 and 28 U.S.C. § 1334, and venue is proper pursuant to 28 U.S.C. § 1409.
2. This adversary proceeding is a core matter pursuant to 28 U.S.C. § 157.

1 injured by the need for Plaintiff to take legal action to get the funds withheld by the Defendant.

2 WHEREFORE Plaintiff seeks relief as follows.

3 **RELIEF SOUGHT**

4 1. On the First Claim for Relief, for judgment that Defendant account for all funds of
5 the Debtor in its possession, and directing it to turn over all such the funds to the Trustee.

6 2. On the Second Claim for Relief, for attorney fees according to proof.

7 3. For interest at 10 % on all funds held after December 29, 2009.

8 4. For costs of suit.

9 5. For such other and further relief as the Court deems appropriate.

10 DATED: February 2, 2010.

11 STROMSHEIM & ASSOCIATES

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13 By /s/ Joanne LaFreniere
14 Attorneys for Plaintiff
15 JANINA M. ELDER, TRUSTEE
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